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*Attorneys for Terremark
WorldWide, Inc., Manuel
Medina, and Jose Segrera*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
STRATEGIC GROWTH INTERNATIONAL, INC.,

Plaintiff,

-against-

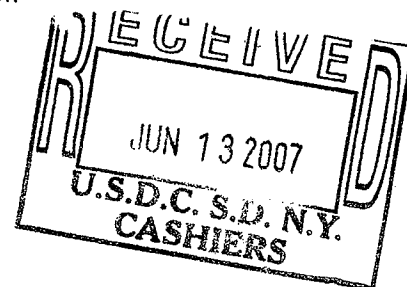
TERREMARK WORLDWIDE, INC.,
MANUEL MEDINA, and JOSE SEGRERA,

Defendants.
-----X

JUDGE KARAS

07 CIV 5647

Case No.:



TO: The Honorable Judge of the United States District Court for the
Southern District of New York

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. § 1441 *et seq.*, Terremark Worldwide, Inc. ("Terremark"),
Manuel Medina and Jose Segrera, (collectively "Defendants") hereby notice the removal
of this civil action from the Supreme Court of the State of New York, County of New
York, to the United States District Court for the Southern District of New York.
Defendants expressly reserve all available objections and defenses, including, without
limitation, lack of jurisdiction over the person, insufficiency of process, insufficiency of
service of process, improper joinder and failure to join a party under Rule 19.

In further support of this Notice of Removal, Defendants state as follows:

GROUND FOR REMOVAL

This Court has jurisdiction over this action pursuant to 15 U.S.C. § 78aa, 28 U.S.C. § 1331, 28 U.S.C. § 1367(a), and 28 U.S.C. § 1441, for the following reasons:

1. On May 17, 2007 Plaintiffs filed a Summons and Complaint (“Complaint”) in the Supreme Court of the State of New York, County of New York, Index No. 106734/07 alleging the following causes of action: (1) violation of Rule 10b-5 promulgated pursuant to Section 10(b) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78j(b) by defendants Medina and Segrera; (2) breach of contract by Terremark; (3) breach of the covenant of good faith and fair dealing by Terremark; (4) negligence as to all defendants; (5) negligent misrepresentation as to all defendants; (6) intentional concealment and negligent non disclosure as to all defendants; (7) unjust enrichment; and (8) declaratory judgment. Venue is proper in this Court pursuant to U.S.C. § 1441(a) because the case is being removed from the Supreme Court for the State of New York, County of New York, which is within this judicial district and division.

2. This Court has exclusive original jurisdiction over the Plaintiff’s first cause of action pursuant to § 27 of the Exchange Act, 15 U.S.C. § 78aa. This Court has supplemental jurisdiction over Plaintiff’s state law claims pursuant to 28 U.S.C. § 1367(a). This action may be removed to this Court pursuant to 28 U.S.C. § 1441(c) which provides that “[w]henver a separate and independent claim or cause of action within the jurisdiction conferred by section 1331 of this title is joined with one or more otherwise non-removable claims or causes of action, the entire case may be removed and

the district court may determine all issues therein, or, in its discretion, may remand all matters in which State law predominates.”

3. Defendant Terremark was served with the Complaint on or about May 25, 2007. Defendants Medina and Segrera received a copy of the Complaint from Plaintiff on or about May 31, 2007. This Notice of Removal is timely under the provisions of 28 U.S.C. § 1446(b), as it is filed within thirty (30) days of Defendants’ receipt of the initial pleading of allegations giving rise to federal question jurisdiction.

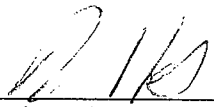
4. Pursuant to 28 U.S.C. § 1446(a), attached as Exhibit “A” to this Notice of Removal is a true and correct copy of the Complaint served upon Defendant Terremark and received by Defendants Medina and Segrera in this action.

5. Pursuant to 28 U.S.C. § 1446(d), concurrently herewith Defendants are filing a copy of this Notice of Removal with the Clerk of the Supreme Court of the State of New York, County of New York. Defendants are serving Plaintiff with a copy of this Notice of Removal. A copy of the Notice of Filing of Notice of Removal is attached hereto as Exhibit “B.”

WHEREFORE, Defendants respectfully give Notice of Removal of the above action now pending against them to the United States District Court for the Southern District of New York, and respectfully request that this Court proceed as if this case had been originally initiated in this Court.

Dated: New York, New York
June 13, 2007

GREENBERG TRAURIG, LLP

By: 
Robert A. Horowitz (RH-2814)
200 Park Avenue
New York, New York 10166
Tel: (212) 801-9200

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this day I served the foregoing **NOTICE OF REMOVAL**
by mailing a true and correct copy thereof to the following person by first-class mail
addressed to:

Debra J. Guzov, Esq.
Guzov Ofsink, LLC
600 Madison Avenue, 14th Floor
New York, New York 11022
Tel.: (212) 371-8008

This 13th day of June, 2007.

A handwritten signature in black ink, appearing to read 'R 14', is written over a horizontal line.

Robert A. Horowitz (RH-2814)